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## DuaneMorris®

FIRM and AFFILIATE OFFICES

MICHAEL J. HOGAN  
DIRECT DIAL: 212-471-1869  
PERSONAL FAX: 212.202.7503  
E-MAIL: [mjhogan@duanemorris.com](mailto:mjhogan@duanemorris.com)

[www.duanemorris.com](http://www.duanemorris.com)

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February 10, 2015

### VIA ECF

Honorable Vincent L. Briccetti  
United States Courthouse  
300 Quarropas Street -- Room 630  
White Plains, New York 10601

**Re: Perini/O&G, a Joint Venture v. Usiminas Mecanica S.A. et al**  
**Civil Action No. 12 CV 1931 (VB)**

Dear Judge Briccetti:

We are attorneys for plaintiff Perini/O&G, a Joint Venture in the referenced action.

We write to you concerning a request for an adjournment of Defendant's Motion for Reconsideration of this Court's Memorandum Decision dated January 20, 2015. Currently, our Opposition is due by February 17, 2015 and Defendant's Reply is due by February 24, 2015. Due to a virus-type illness and the recent severe weather, I have missed several days of work which has put me behind in the progress of this matter, as well as other matters. In addition, the parties are engaging in settlement discussions. As a result, it is respectfully requested that the due date for our Opposition be extended to March 2, 2015 and that Defendant's Reply to be due by March 10, 2015.

In order to keep the same sequence of currently scheduled matters, it is also respectfully requested that the due date for the joint pretrial order currently scheduled for February 20, 2015 be adjourned to March 6, 2015. Also, the status conference currently scheduled for February 27, 2015 be adjourned to March 13, 2015.

DUANE MORRIS LLP

1540 BROADWAY NEW YORK, NY 10036-4086  
DM1\5377229.1


PHONE: +1 212 692 1000 FAX: +1 212 692 1020

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No prior requests for adjournments of the above scheduled dates have been requested. Counsel for Defendant consents to the granting of this request. Thank you.

Very truly yours,

  
Michael J. Hogan

MJH:mdb

cc: Jeffrey Gilmore, Esq.